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March 9, 2018

BY ECF & FAX

The Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, NY 10007
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Re: Request for an Extension of Time to Respond to Complaint and
Adjournment of the Pre-Trial Conference
Alfredo Cruz Sanchez, et al. v. Rainbow Umbrella, et al.
Case No.: 17 Civ. 9065 (PGG)

Dear Judge Gardephe:

We are the attorneys for the Defendants in connection with the above-referenced wage and hour action.

Defendants hereby respectfully request an extension of time to respond to the Complaint. Plaintiffs' counsel has represented to us that Plaintiffs will be amending the Complaint in order to add several new named plaintiffs to this case. In light of such representation, and in order to avoid Defendants responding to multiple complaints, we request that Defendants' deadline to respond to the Complaint be extended to fourteen (14) days after filing of Plaintiffs' forthcoming amended Complaint. Defendants' deadline to respond to the Complaint is currently March 12, 2018. This is the second request for an extension of time to respond to the Complaint.

In the event the request for an extension of time to respond to the forthcoming amended Complaint is granted, we respectfully request an adjournment of the initial conference, currently scheduled for April 5, 2018, to a date shortly after the herein requested deadline to respond to Plaintiffs' amended pleading. Similarly, as a result of this request to adjourn the initial conference, Defendants further request an extension of time to submit the joint letter and proposed case management plan, which is currently due on March 29, 2018.



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Despite several attempts, we have been unable to confirm opposing counsel's consent to this application. However, Plaintiffs' counsel had previously stated that he would be amenable to providing more time for Defendants to respond to an amended Complaint.

Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Joseph D. Lockinger', with a long horizontal flourish extending to the right.

Joseph D. Lockinger

cc: Colin James Mulholland, Esq.
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